

Thomas Edward Geiger Defendant, Pro Se 817 N. McCrary Rd. Columbus, MS 39702 Telephone: (662) 328-3630  $\left(26\right)$ 

GORDON ROY PARKER, a.k.a. Ray Gordon, dba Snodgrass Publishing Group, 4247 Locust Street, 0806 Philadelphia, PA 19104

Plaintiff,

 $V^*$ 

Learn The Skills Corp., c/o Business Filings, Inc., 9 East Lockerman Street, Suite 205 Dover, DE 19901; Formhandle@fastseduction.com, c/o Business Filings, Inc., 9 East Lockerman Street, Suite 205, Dover, DE 19901; Thom E. Geiger, 817 North McCrary Road, Columbus, MS 39702-4320; Paul Ross, a/k/a "Ross Jeffries" a/k/a ErosLA77@aol.com, 310 Tahiti Way, Marina Del Ray, CA, 90292-6789, Trustees of the University of Pennsylvania, 133 South 36<sup>th</sup> Street, 3<sup>rd</sup> Floor, Philadelphia, PA. 19104, Matthew S. Wolf, Esq., 1236 Brace Road, Unit K, Cherry Hill, NJ, 08034, and John Does 1-10.

Defendants.

Filed: June 9, 2005

CASE NO.: 05-cv-2752

Hon. Harvey Bartle, III

FILED

NOV 2 3 2005

MICHAEL E. KUNZ, Clerk By \_\_\_\_\_\_Dep. Clerk

DEFENDANT THOMAS GEIGER'S MOTION FOR AN EXTENSION OF TIME TO FILE A REPONSIVE PLEADING.

-1-

CASE NO.: 05-cv-2752

Case 2:05-cv-02752-HB Document 26 Filed 11/23/05 Page 2 of 4

Comes now Defendant pro se Thomas Geiger, in the above referenced matter before the United

States District Court for the Eastern District of Pennsylvania, to respectfully move the Court for

a 30 day extension of time to file a responsive pleading to the current complaint.

Pro Se Defendant requests this extension due to the hardships that have been placed, and will be

placed, on Defendant in the last 15 days and extending into the next 30 days resulting from an

urgent technology process initiated by the U.S. Department of Defense in which Defendant will

play a vital part. (See Exhibit A)

Included in this Motion and request is a statement by Defendant's immediate supervisor attesting

to the fact that Defendant has been and will be required to work extended hours and weekends in

furtherance of this process. As a pro se Defendant, the lack of sufficient time to devote to an

adequate response to the current complaint will unduly prejudice Defendant in this action.

Details of this program and process are sensitive in nature but can be furnished to the court

should the need arise.

Defendant should be sufficiently free of time constraints in 30 days to construct a responsive

pleading to Plaintiff's current complaint. Given that the issues of the current and past complaints

have been ongoing for over two years, Defendant believes Plaintiff will not be unduly harmed by

the granting of this extension.

By my hand this 21<sup>st</sup> day of November 2005

Thom E. Geiger, Defendant pro se

Defendant, Pro Se

817 N. McCary Rd.,

Columbus, MS. 39702

(662) 328-3630

EXHIBIT A

This is to confirm the facts stated by Thomas Geiger concerning his involvement in a critical, current ongoing process initiated by the United States Air Force. Mr. Geiger will be required to work extended hours and weekends and has been doing so. The process should be finished in 30 days, after which Mr. Geiger should be able to return to his regular hours of work.

Signed

Kenneth Foster, Supervisor

MXOD Data Management

14MX Maintenance Directorate

14 FTW, Columbus Air Force Base, MS.

662-434-2358

GORDON ROY PARKER, a.k.a. Ray Gordon, dba Snodgrass Publishing Group,

4247 Locust Street, 0806 Philadelphia, PA 19104

Plaintiff,

V\*

Learn The Skills Corp., c/o Business Filings, Inc., 9 East Lockerman Street, Suite 205 Dover, DE 19901; Formhandle@fastseduction.com, c/o Business Filings, Inc., 9 East Lockerman Street, Suite 205, Dover, DE 19901; Thom E. Geiger, 817 North McCrary Road, Columbus, MS 39702-4320; Paul Ross, a/k/a "Ross Jeffries" a/k/a ErosLA77@aol.com, 310 Tahiti Way, Marina Del Ray, CA, 90292-6789, Trustees of the University of Pennsylvania, 133 South 36<sup>th</sup> Street, 3<sup>rd</sup> Floor, Philadelphia, PA. 19104, Matthew S. Wolf, Esq., 1236 Brace Road, Unit K, Cherry Hill, NJ, 08034, and John Does 1-10.

Defendants.

Filed: June 9, 2005



CASE NO.: 05-cv-2752

Hon. Harvey Bartle, III

## DEFENDANT THOMAS GEIGER'S MOTION FOR AN EXTENSION OF TIME TO FILE A REPONSIVE PLEADING.

I hereby certify that I caused to be mailed a true and correct copy of the foregoing MOTION FOR AN EXTENSION OF TIME TO FILE A REPONSIVE PLEADING to:

GORDON ROY PARKER Plaintiff, Pro Se 4247 Locust Street, #806, Philadelphia, PA 19104 (215) 386-7366

on the 21st day of November 2005, postage prepaid in the United States Postal Service. Dated this 21st day of November, 2005

Thom E. Geiger, Defendant pro se

Defendant, Pro Se 817 N. McCary Rd., Columbus, MS. 39702

(662) 328-3630